

# **EXHIBIT 13**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICHARD ROSARIO,

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

18-cv-4023 (LGS)

**DECLARATION OF KATHERINE HAAS**

KATHERINE HAAS, an attorney admitted to practice in the State of New York and the Southern District of New York, submits this declaration under penalty of perjury:

1. From October 2020 until August 2022, I was employed as a fellow at the firm Neufeld Scheck & Brustein, LLP, (“NSB”) with offices at 99 Hudson Street, 8th Floor, New York, New York 10013.
2. I make this declaration in support of an application for attorneys’ fees pursuant to 42 U.S.C. § 1988, covering the hours I expended on this matter. I am fully familiar with the facts discussed herein.

**EDUCATION AND EXPERIENCE**

3. I graduated from Yale Law School in 2017. After graduating, I clerked for Hon. Sidney H. Stein in the U.S. District Court for the Southern District of New York. Following my clerkship, I was a legal fellow at the American Civil Liberties Union of New Jersey for two years before I began my fellowship at NSB in 2020. My resume is attached as Exhibit A.
4. During my time at NSB, I worked primarily on 42 U.S.C. § 1983 civil rights litigation in federal courts around the country. My practice focused on wrongful conviction cases such as Richard Rosario’s, involving lawsuits against police for unconstitutional misconduct.

This body of law, arising at the intersection of criminal procedure and civil rights, is relatively new and constantly evolving. To my knowledge, NSB is the only firm in the nation litigating these issues full time.

5. Generally, all these cases involve procedural defenses such as absolute and qualified immunity and require a nuanced understanding of the differences between what it takes to vacate a criminal conviction and the elements of civil liability. In addition, the cases typically involve the same sets of claims, including for fabrication of evidence, *Brady*, and malicious prosecution, and involve similarly flawed inculpatory evidence, including misidentifications caused by suggestive identification procedures. My focus on these issues during my time at NSB, as well as access to NSB's collective knowledge derived from litigating these cases for over twenty years, made my work on this case much more efficient than it otherwise would have been.
6. On behalf of Plaintiff, I am seeking compensation for my work at a rate of \$400 an hour. In my opinion, this requested rate is reasonable in light of the relevant market and my experience and skill.

#### **WORK IN THIS CASE**

7. I am seeking compensation, on behalf of Plaintiff, for the time I spent on this matter from January 2021 to August 2022.
8. Under the guidance of my senior colleagues, Emma Freudenberger, Nick Brustin, and Anna Benvenutti Hoffmann, I drafted motions in limine, supervised the paralegals and interns in the case, helped prepare for trial, drafted pretrial materials, drafted various letters to the Court, prepared exhibits for trial, met and coordinated with witnesses and experts, and participated in Court pretrial conferences. During trial, I was heavily involved in preparing each day and drafting motions and letters to the Court, in addition to preparing, organizing, and setting up trial exhibit display.

9. As set forth in the billing records attached as Exhibit B, which come from contemporaneously kept timekeeping logs, I am seeking compensation for a total of 663.4 attorney hours in this matter.
10. I have reviewed the attached billing record in its entirety, and made an effort to take a conservative and reasonable approach to the total hours for which I seek compensation. In my judgment, each hour set forth in Exhibit B was necessitated by the circumstances and reasonably expended in pursuit of the ultimate favorable outcome in this complicated and important civil rights case.
11. I hereby declare under penalty of perjury that the foregoing is true.

Date: October 5, 2022

New York, NY



KATHERINE HAAS

# **EXHIBIT A**

## **Katherine Haas**

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### **EDUCATION AND BAR ADMISSIONS**

**Yale Law School**, New Haven, CT

Juris Doctor, May 2017

Activities:      Rebellious Lawyering Conference (2016: Co-Director, 2015: Panel Organizer); International Refugee Assistance Project (2014–16)

**Yale University**, New Haven, CT

B.A. cum laude with distinction in History, May 2012

Honors:      Arthur Liman Public Interest Program, Summer 2011 Undergraduate Fellow

Max Bildner Prize in Latin American History, for best senior essay in that subject area

Saybrook Head of College's Prize, awarded by head of college for general achievements

**Bar Admissions:** New York, New Jersey

### **EXPERIENCE**

**Neufeld Scheck & Brustein, LLP**, New York, NY

2020 – 2022: Johnnie L. Cochran, Jr. Civil Rights Fellow

- Represented formerly incarcerated clients across the country in Section 1983 wrongful conviction cases against police officers, with a focus on claims of fabrication of evidence, use of suggestive identification procedures, *Brady* violations, and malicious prosecution
- Drafted numerous filings including complaints, briefs, motions in limine, and proposed jury instructions
- Appeared in hearings and conferences before both federal and state courts, including arguing for the admissibility of trial exhibits in the Southern District of New York, arguing a discovery dispute before a federal Magistrate Judge, and arguing a motion before the New York State Court of Claims
- Developed skills in all aspects of discovery, including written discovery, depositions, production of documents, analysis of privilege issues, and efficient review of voluminous documentation produced by opposing parties
- Participated in preparation for civil rights trial in the Southern District of New York, including crafting direct examinations of witnesses and managing documentary evidence
- Managed communications with opposing counsel, including during settlement negotiations and discovery disputes

**American Civil Liberties Union of New Jersey**, Newark, NJ

2018 – 2020: Law Fellow

- Brought emergency litigation on behalf of immigrants detained in New Jersey county jails at the start of the COVID-19 pandemic, drafted initial petitions and briefs in support of motions seeking temporary restraining orders for their immediate release, and participated in argument on those motions before the United States District Court for the District of New Jersey
- Gathered facts and developed litigation strategy for a constitutional challenge to the use of solitary confinement in immigration detention in New Jersey county jails through legal research and analysis, interviews with potential clients, and public records requests
- Took part in drafting a proposed county ordinance to create a civilian oversight body that included formerly incarcerated people at the Essex County Correctional Facility, and successfully secured its passage through both public advocacy and private lobbying of political actors

- Drafted amicus briefs and argued twice before the New Jersey Supreme Court and once before the New Jersey Appellate Division on issues including the right to counsel in administrative child abuse proceedings and the Ex Post Facto implications of amendments to Megan's Law
- Researched and crafted *Monell* claim against a New Jersey municipality that held a United States citizen in custody under an ICE detainer, and co-drafted resulting complaint
- Co-drafted amicus briefs in *Ocean County v. Grewal* and *United States v. Grewal*, arguing that the New Jersey Attorney General's Immigrant Trust Directive limiting state and local law enforcement cooperation with ICE could not be preempted by federal statutes due to constitutional anti-commandeering principles

**Hon. Sidney H. Stein, U.S. District Court for the Southern District of New York, New York, NY**

2017 – 2018: Law Clerk

- Performed legal research, writing, and various other tasks to support Judge Stein's work

**Worker and Immigrant Rights Advocacy Clinic, Yale Law School**

2015 – 2017: Law Student Intern

- Worked on multiple federal claims related to immigrants' rights, including a Federal Tort Claims Act case regarding the detention of an asylum-seeking woman and her child, a potential Rehabilitation Act claim regarding family detention practices at the border, and a challenge to the Trump administration's first travel ban
- Participated in immigrants' rights cases before administrative bodies and state courts, including a removal defense case before the Board of Immigration Appeals, and a state petition for a writ of habeas corpus based on the Supreme Court's decision in *Padilla v. Kentucky*
- Visited immigration detention center to provide deportation defense advice and know-your-rights presentations
- Drafted briefs and motions, researched and wrote legal memoranda, and engaged in client counseling

**New York Civil Liberties Union, New York, NY**

May 2016 – July 2016: Law Student Intern

- Researched and wrote memoranda in support of litigation, including a federal case challenging the use of solitary confinement for incarcerated children
- Worked closely with supervising attorney to draft filings in administrative case regarding immigrant access to public education

**Prisoners' Legal Services of Massachusetts, Boston, MA**

May 2015 – August 2015: Law Student Intern

- Researched and wrote legal memoranda in support of litigation to protect the rights of Massachusetts prisoners
- Visited state prison facilities and a jail to interview clients and witnesses to troubling incidents
- Drafted advocacy letters to prison officials on behalf of individual clients

**American Civil Liberties Union, National Office, New York, NY**

2012 – 2014: Legal Assistant, Paralegal

- Conducted research, drafted documents such as public records requests, and performed administrative tasks for the ACLU's Speech, Privacy & Technology Project and Human Rights Program

# **EXHIBIT B**

## ALL HOURS

Date	Person	Client	Activity	Description	Duration	Time Totals
22-Jan-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma, Anna, Nick, Kayla, and Chip	0:30	0.5
22-Jan-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Nick, Emma, Anna and Rick re Daubert motions	0:18	0.3
10-Feb-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma and Nick re: trial prep	0:18	0.3
12-Feb-21	Katie Haas	Rosario (Richard)	Phone Call	Call with potential consultants and follow-up	0:45	0.8
17-Feb-21	Katie Haas	Rosario (Richard)	Review	Review case documents and media reports	2:30	2.5
18-Feb-21	Katie Haas	Rosario (Richard)	Review	Review case documents and media reports	1:30	1.5
				Call with Nick, Anna, Emma, and Kayla re trial prep, and follow up call with Kayla		
18-Feb-21	Katie Haas	Rosario (Richard)	Meeting	Call with Nick, Anna, Emma, and Kayla re trial prep, and follow up call with Kayla	1:09	1.2
22-Feb-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma and Kayla re trial prep	0:30	0.5
24-Feb-21	Katie Haas	Rosario (Richard)	Correspondence	Internal correspondence re status conference	0:15	0.3
25-Feb-21	Katie Haas	Rosario (Richard)	Court appearance	Status conference	0:21	0.4
25-Feb-21	Katie Haas	Rosario (Richard)	Meeting	Meeting with jury advisors	1:00	1.0
26-Feb-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Kayla and Anna re trial prep	0:18	0.3
2-Mar-21	Katie Haas	Rosario (Richard)	Draft	Create filing checklist	1:45	1.8
2-Mar-21	Katie Haas	Rosario (Richard)	Phone Call	Call to Bard Prison Project	0:06	0.1
3-Mar-21	Katie Haas	Rosario (Richard)	Correspondence	Emails to potential witnesses	0:09	0.2
5-Mar-21	Katie Haas	Rosario (Richard)	Review	Revise filing checklist	0:15	0.3
9-Mar-21	Katie Haas	Rosario (Richard)	Review	Review Daubert motion	0:30	0.5
				Meeting with Nick, Anna, Emma, Bettina, Kayla re Daubert response		
9-Mar-21	Katie Haas	Rosario (Richard)	Meeting	Meeting with Nick, Anna, Emma, Bettina, Kayla re Daubert response	0:18	0.3
10-Mar-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna re jury instructions	0:12	0.2
				Call with Anna, Emma, Bettina, Katie M., and Kate re motions in limine		
12-Mar-21	Katie Haas	Rosario (Richard)	Meeting	Call with Anna, Emma, Bettina, Katie M., and Kate re motions in limine	0:42	0.7
16-Mar-21	Katie Haas	Rosario (Richard)	Draft	Adding claims to pretrial order	0:45	0.8
17-Mar-21	Katie Haas	Rosario (Richard)	Draft	Adding claims to pretrial order	0:30	0.5
21-Mar-21	Katie Haas	Rosario (Richard)	Review	Cite check and proofread Daubert opposition	3:00	3.0
22-Mar-21	Katie Haas	Rosario (Richard)	Review	Cite check and proofread Daubert opposition	1:00	1.0
23-Mar-21	Katie Haas	Rosario (Richard)	Draft	Draft motion to strike	1:30	1.5
23-Mar-21	Katie Haas	Rosario (Richard)	Meeting	Meet and confer with opposing counsel	0:39	0.7
24-Mar-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Bettina and Anna re Daubert reply brief	0:18	0.3
25-Mar-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma and potential damages witness	0:30	0.5
31-Mar-21	Katie Haas	Rosario (Richard)	Meeting	Meeting with jury consultant group	0:24	0.4

2-Apr-21	Katie Haas	Rosario (Richard)	Draft	Draft jury instructions	2:30	2.5
3-Apr-21	Katie Haas	Rosario (Richard)	Draft	Draft jury instructions	3:00	3.0
4-Apr-21	Katie Haas	Rosario (Richard)	Draft	Draft jury instructions	1:30	1.5
5-Apr-21	Katie Haas	Rosario (Richard)	Draft	Draft jury instructions	5:00	5.0
8-Apr-21	Katie Haas	Rosario (Richard)	Phone Call	Call with potential witness	0:06	0.1
8-Apr-21	Katie Haas	Rosario (Richard)	Meeting	Meeting with Emma and Kayla	0:30	0.5
8-Apr-21	Katie Haas	Rosario (Richard)	Draft	Revise jury instructions	1:30	1.5
9-Apr-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna, Emma, and Nick re jury instructions	0:36	0.6
12-Apr-21	Katie Haas	Rosario (Richard)	Deposition	Minerva deposition	3:00	3.0
13-Apr-21	Katie Haas	Rosario (Richard)	Draft	Revise and finalize jury instructions	2:00	2.0
14-Apr-21	Katie Haas	Rosario (Richard)	Draft	Revise and finalize jury instructions	1:30	1.5
14-Apr-21	Katie Haas	Rosario (Richard)	Draft	Draft verdict sheet	1:30	1.5
15-Apr-21	Katie Haas	Rosario (Richard)	Draft	Revise and finalize jury instructions	0:30	0.5
15-Apr-21	Katie Haas	Rosario (Richard)	Review	Review digests of Richard testimony	1:00	1.0
16-Apr-21	Katie Haas	Rosario (Richard)	Review	Review digests of Richard testimony	2:30	2.5
16-Apr-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna and Emma re motions in limine	0:45	0.8
				Call re voir dire with Emma, Nick, Anna, Yasmin, Kayla, Jahne		
19-Apr-21	Katie Haas	Rosario (Richard)	Meeting		1:30	1.5
22-Apr-21	Katie Haas	Rosario (Richard)	Draft	Draft motion in limine	2:30	2.5
3-May-21	Katie Haas	Rosario (Richard)	Draft	Draft letter to court re trial dates	0:24	0.4
				Email to opposing counsel re, finalizing, and supervising filing of letter to court		
4-May-21	Katie Haas	Rosario (Richard)	Filing		0:15	0.3
18-May-21	Katie Haas	Rosario (Richard)	Meeting	Mtg with Anna and Emma re pretrial deadlines	0:15	0.3
18-May-21	Katie Haas	Rosario (Richard)	Phone Call	Call to witness re scheduling	0:09	0.2
18-May-21	Katie Haas	Rosario (Richard)	Meeting	Meeting with Nick and Emma re Rosario priorities	0:15	0.3
20-May-21	Katie Haas	Rosario (Richard)	Phone Call	Call with witness re scheduling	0:06	0.1
				Internal emails and emails with opposing counsel re scheduling		
27-May-21	Katie Haas	Rosario (Richard)	Correspondence		0:30	0.5
27-May-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma and opposing counsel	0:12	0.2
28-May-21	Katie Haas	Rosario (Richard)	Draft	Draft letter motion for extension	0:30	0.5
2-Jun-21	Katie Haas	Rosario (Richard)	Correspondence	Emails to experts	0:09	0.2
4-Jun-21	Katie Haas	Rosario (Richard)	Correspondence	Emails with opposing counsel and internal call re scheduling	0:15	0.3
				Call witnesses and emails to opposing counsel re scheduling deps		
10-Jun-21	Katie Haas	Rosario (Richard)	Correspondence		0:15	0.3

10-Jun-21	Katie Haas	Rosario (Richard)	Meeting	limine	0:42	0.7
10-Jun-21	Katie Haas	Rosario (Richard)	Meeting	Meeting with jury consultants	0:15	0.3
11-Jun-21	Katie Haas	Rosario (Richard)	Draft	Draft letter-motion for extension of time	1:00	1.0
14-Jun-21	Katie Haas	Rosario (Richard)	Correspondence	Emails to opposing counsel	0:12	0.2
14-Jun-21	Katie Haas	Rosario (Richard)	Draft	Motion for extensions of time	0:24	0.4
15-Jun-21	Katie Haas	Rosario (Richard)	Phone Call	Call re Rosario motions in limine with Anna and Christina	0:21	0.4
16-Jun-21	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
16-Jun-21	Katie Haas	Rosario (Richard)	Draft	Revisions to motion in limine	1:30	1.5
17-Jun-21	Katie Haas	Rosario (Richard)	Draft	Revisions to motion in limine	1:00	1.0
21-Jun-21	Katie Haas	Rosario (Richard)	Draft	Draft motions in limine	4:00	4.0
21-Jun-21	Katie Haas	Rosario (Richard)	Phone Call	Rosario team call re motions in limine	0:45	0.8
22-Jun-21	Katie Haas	Rosario (Richard)	Draft	Draft motions in limine	3:00	3.0
23-Jun-21	Katie Haas	Rosario (Richard)	Draft	Draft motions in limine	7:30	7.5
24-Jun-21	Katie Haas	Rosario (Richard)	Draft	Draft motions in limine	8:00	8.0
25-Jun-21	Katie Haas	Rosario (Richard)	Review	Reviews Defs' motions in limine	0:30	0.5
				Call with Anna, Emma, Christina, Rhianna, Bianca re MIL responses		
25-Jun-21	Katie Haas	Rosario (Richard)	Phone Call		0:36	0.6
6-Jul-21	Katie Haas	Rosario (Richard)	Prep	Dep scheduling coordination	0:09	0.2
6-Jul-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma and Kayla re stipulations	0:09	0.2
7-Jul-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma re motion in limine response	0:09	0.2
7-Jul-21	Katie Haas	Rosario (Richard)	Draft	Draft response to MIL	3:00	3.0
7-Jul-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma and Anna re motion in limine	0:12	0.2
8-Jul-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Nick re motion in limine response	0:06	0.1
8-Jul-21	Katie Haas	Rosario (Richard)	Draft	Draft response to MIL	0:30	0.5
				Internal emails and email with opposing counsel re extension request		
9-Jul-21	Katie Haas	Rosario (Richard)	Correspondence		0:09	0.2
9-Jul-21	Katie Haas	Rosario (Richard)	Review	Supervise providing full dep transcripts to court under individual rules	0:18	0.3
13-Jul-21	Katie Haas	Rosario (Richard)	Review	Revise and finalize response to motions in limine	2:30	2.5
14-Jul-21	Katie Haas	Rosario (Richard)	Review	Review and finalize MIL response	5:00	5.0
				Gathering and reviewing complete transcripts for email submission to court		
14-Jul-21	Katie Haas	Rosario (Richard)	Documentation		2:00	2.0
15-Jul-21	Katie Haas	Rosario (Richard)	Correspondence	Organize and send complete dep transcripts to chambers	1:00	1.0
15-Jul-21	Katie Haas	Rosario (Richard)	Filing	Re-file declaration and exhibits	1:30	1.5

15-Jul-21	Katie Haas	Rosario (Richard)	Correspondence	Internal emails with opposing counsel re deadlines and pretrial materials	0:12	0.2
19-Jul-21	Katie Haas	Rosario (Richard)	Prep	Dep prep call with witness	1:00	1.0
19-Jul-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma and Anna re scheduling	0:12	0.2
19-Jul-21	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
22-Jul-21	Katie Haas	Rosario (Richard)	Draft	Draft extension request	0:30	0.5
23-Jul-21	Katie Haas	Rosario (Richard)	Correspondence	Back and forth with opposing counsel re extension request	0:15	0.3
24-Jul-21	Katie Haas	Rosario (Richard)	Draft	Draft motion in limine	1:30	1.5
25-Jul-21	Katie Haas	Rosario (Richard)	Draft	Draft/revise motion in limine	3:00	3.0
26-Jul-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna re MIL draft	0:24	0.4
27-Jul-21	Katie Haas	Rosario (Richard)	Draft	Draft/revise motion in limine	1:00	1.0
28-Jul-21	Katie Haas	Rosario (Richard)	Draft	Draft/revise motion in limine	3:00	3.0
28-Jul-21	Katie Haas	Rosario (Richard)	Review	Review exhibits to MIL	0:15	0.3
29-Jul-21	Katie Haas	Rosario (Richard)	Filing	Finalize and file MIL, declaration, exhibits	3:00	3.0
30-Jul-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma re dep prep	0:33	0.6
				Call with witness and Kayla re deposition, and follow up call with Kayla		
6-Aug-21	Katie Haas	Rosario (Richard)	Phone Call		0:39	0.7
17-Aug-21	Katie Haas	Rosario (Richard)	Correspondence	Emails with consultants and internal emails	0:15	0.3
25-Aug-21	Katie Haas	Rosario (Richard)	Review	Review pretrial materials from defendants and send internal emails	0:36	0.6
25-Aug-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna and Emma re pretrial materials	0:30	0.5
25-Aug-21	Katie Haas	Rosario (Richard)	Correspondence	Emails with consultants	0:06	0.1
26-Aug-21	Katie Haas	Rosario (Richard)	Correspondence	Review exhibits and email to court	0:18	0.3
26-Aug-21	Katie Haas	Rosario (Richard)	Review	Review jury questionnaire briefing materials	0:45	0.8
26-Aug-21	Katie Haas	Rosario (Richard)	Meeting	notes	1:00	1.0
27-Aug-21	Katie Haas	Rosario (Richard)	Review	Review jury charges from opposing counsel	0:45	0.8
27-Aug-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna re pretrial materials	0:42	0.7
30-Aug-21	Katie Haas	Rosario (Richard)	Administrative	Asana update	0:06	0.1
1-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Trial prep call with Emma, Nick, Kayla	0:18	0.3
1-Sep-21	Katie Haas	Rosario (Richard)	Review	Revise jury questionnaire	0:30	0.5
2-Sep-21	Katie Haas	Rosario (Richard)	Draft	Draft opposition to pretrial motion	5:00	5.0
3-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma and Anahi re trial deposition motion, follow up email search	0:21	0.4
3-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Calls with Emma and witnesses, follow up tasks	0:33	0.6

3-Sep-21	Katie Haas	Rosario (Richard)	Documentation	Look for documents, send internal emails	0:12	0.2
7-Sep-21	Katie Haas	Rosario (Richard)	Meeting	Mtg with Emma, Nick, Kayla re JPTO and follow up tasks	2:30	2.5
7-Sep-21	Katie Haas	Rosario (Richard)	Draft	Draft portions of JPTO	3:00	3.0
8-Sep-21	Katie Haas	Rosario (Richard)	Prep	revisions to jury instructions and verdict sheet, internal emails	7:30	7.5
9-Sep-21	Katie Haas	Rosario (Richard)	Review	Review edits to opposition to pretrial motion, internal emails	0:30	0.5
9-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Kayla re trial exhibits	0:18	0.3
9-Sep-21	Katie Haas	Rosario (Richard)	Prep	Revise opposition to pretrial motion, legal research, call with Kayla, review trial exhibits	4:30	4.5
9-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Meet and confer with opposing counsel and follow up notes & tasks	0:30	0.5
10-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Kayla and Emma re JPTO and follow-up notes	0:24	0.4
10-Sep-21	Katie Haas	Rosario (Richard)	Draft	Revisions to jury instructions	1:00	1.0
10-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Calls with Emma re JPTO	0:12	0.2
10-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Kayla re JPTO	0:15	0.3
10-Sep-21	Katie Haas	Rosario (Richard)	Review	Review and revise JPTO	1:30	1.5
13-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anahi re cite checking opposition brief	0:06	0.1
13-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma re JPTO	0:24	0.4
13-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Kayla, Emma re JPTO	0:21	0.4
13-Sep-21	Katie Haas	Rosario (Richard)	Prep	Revisions to pretrial materials (JPTO, jury instructions, verdict sheet), proofreading and filing opposition brief to pretrial memoranda, draft and send email to opposing counsel, internal emails re pretrial materials	4:30	4.5
14-Sep-21	Katie Haas	Rosario (Richard)	Draft	Draft and revise letter-motion for extension	0:36	0.6
15-Sep-21	Katie Haas	Rosario (Richard)	Meeting	Meet and confer with opposing counsel and Anna re jury instructions, verdict sheet	1:45	1.8
16-Sep-21	Katie Haas	Rosario (Richard)	Draft	Draft and revise motion for jury questionnaire, attached materials	4:00	4.0
16-Sep-21	Katie Haas	Rosario (Richard)	Review	Review expert affidavit	0:30	0.5
16-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna, Emma, Nick re pretrial materials	0:30	0.5
17-Sep-21	Katie Haas	Rosario (Richard)	Draft	Draft and revise motion for jury questionnaire, attached materials	4:30	4.5
20-Sep-21	Katie Haas	Rosario (Richard)	Filing	Finalize and supervise filing of jury questionnaire motion	3:00	3.0
20-Sep-21	Katie Haas	Rosario (Richard)	Meeting	Meetings re deadlines, etc. with Anna and Emma	0:18	0.3

21-Sep-21	Katie Haas	Rosario (Richard)	Administrative	Organize and respond to emails	0:12	0.2
21-Sep-21	Katie Haas	Rosario (Richard)	Research	Research re authentication of records	0:42	0.7
21-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Kayla re requesting certified records	0:06	0.1
23-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Brachah and Anna, and follow-up call with Anna	0:12	0.2
23-Sep-21	Katie Haas	Rosario (Richard)	Draft	Draft pre-motion letter re jury questionnaire	1:00	1.0
24-Sep-21	Katie Haas	Rosario (Richard)	Draft	Draft pre-motion letter re jury questionnaire	0:18	0.3
27-Sep-21	Katie Haas	Rosario (Richard)	Draft	Research and draft/revise pre-motion letter re trial depositions, related calls with Emma, related emails	4:00	4.0
28-Sep-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna, Emma, Nick, Kayla re voir dire	0:42	0.7
29-Sep-21	Katie Haas	Rosario (Richard)	Review	Review prison letters for potential trial exhibits	4:15	4.3
29-Sep-21	Katie Haas	Rosario (Richard)	Review	Review records request, related call with Kayla	0:12	0.2
30-Sep-21	Katie Haas	Rosario (Richard)	Review	Review prison letters for potential trial exhibits	0:30	0.5
30-Sep-21	Katie Haas	Rosario (Richard)	Correspondence	Review emails from opposing counsel; internal emails re responses	0:24	0.4
30-Sep-21	Katie Haas	Rosario (Richard)	Documentation	Preparing compilation exhibits, including phone calls with Emma and Kayla, reviewing and organizing exhibits, internal emails, and emails to opposing counsel	3:00	3.0
1-Oct-21	Katie Haas	Rosario (Richard)	Correspondence	Review draft letter to court from opposing counsel, respond via email	0:12	0.2
1-Oct-21	Katie Haas	Rosario (Richard)	Draft	Revise draft verdict sheet, send to trial team for feedback, send to opposing counsel	1:00	1.0
5-Oct-21	Katie Haas	Rosario (Richard)	Prep	Emails with opposing counsel and internal emails re pretrial materials, review and finalize pre-motion letter, review pre-trial materials from opposing counsel, call with Kayla re editing voir dire, sending voir dire revisions to opposing counsel	2:30	2.5
6-Oct-21	Katie Haas	Rosario (Richard)	Filing	Pre-trial filings: review opposing counsel's edits, calls with Anna about our edits, entering our edits, internal correspondence, correspondence with opposing counsel	7:00	7.0
7-Oct-21	Katie Haas	Rosario (Richard)	Filing	Finalize pre-letter motion re trial deps	0:24	0.4
7-Oct-21	Katie Haas	Rosario (Richard)	Filing	Edits to pretrial materials, calls and emails with opposing counsel, internal meeting re pretrial materials, finalizing and formatting of pretrial materials	6:30	6.5

14-Oct-21	Katie Haas	Rosario (Richard)	Loan	Review loan folder, meeting with Kayla re loans, arrange call with US Claims	0:30	0.5
15-Oct-21	Katie Haas	Rosario (Richard)	Loan	Call with Donna Lee and Nick, email to Donna Lee	0:30	0.5
15-Oct-21	Katie Haas	Rosario (Richard)	Review	Review response letter re trial deps, chats with Emma	0:18	0.3
21-Oct-21	Katie Haas	Rosario (Richard)	Filing	Draft, revise, and file letter to court	0:48	0.8
25-Oct-21	Katie Haas	Rosario (Richard)	Review	Review court's memo endorsement re ex parte letter and send internal email	0:06	0.1
26-Oct-21	Katie Haas	Rosario (Richard)	Meeting	Emma	1:00	1.0
28-Oct-21	Katie Haas	Rosario (Richard)	Correspondence	Internal emails and email with witness re verifying deposition transcript	0:15	0.3
29-Oct-21	Katie Haas	Rosario (Richard)	Phone Call	Emails and phone calls with Anahi (intern) re outlining assignment	0:18	0.3
1-Nov-21	Katie Haas	Rosario (Richard)	Discovery	Review Maldonado dep errata, internal email, send to opposing counsel	0:45	0.8
3-Nov-21	Katie Haas	Rosario (Richard)	Correspondence	Email to expert and internal email	0:06	0.1
4-Nov-21	Katie Haas	Rosario (Richard)	Correspondence	Email to expert	0:06	0.1
10-Nov-21	Katie Haas	Rosario (Richard)	Review	Review court's order, search email, internal emails regarding witnesses	0:30	0.5
15-Nov-21	Katie Haas	Rosario (Richard)	Correspondence	Internal emails	0:12	0.2
15-Nov-21	Katie Haas	Rosario (Richard)	Draft	draft letter to court re remote testimony and internal emails	0:24	0.4
15-Nov-21	Katie Haas	Rosario (Richard)	Review	Review word documents to send to court	0:21	0.4
15-Nov-21	Katie Haas	Rosario (Richard)	Correspondence	Emails with opposing counsel and internal emails re transcript designations and request for courtconference	0:30	0.5
16-Nov-21	Katie Haas	Rosario (Richard)	Review	Revise letter to court and finalize for filing	0:18	0.3
19-Nov-21	Katie Haas	Rosario (Richard)	Correspondence	Review email from opposing counsel, internal email	0:06	0.1
22-Nov-21	Katie Haas	Rosario (Richard)	Review	Review previous digesting work	0:15	0.3
22-Nov-21	Katie Haas	Rosario (Richard)	Draft	Draft and file letter to court requesting conference	1:00	1.0
23-Nov-21	Katie Haas	Rosario (Richard)	Review	Review motion in limine decision, discuss with Anna, email to Chip, email to Richard	1:00	1.0
24-Nov-21	Katie Haas	Rosario (Richard)	Phone Call	Call with opposing counsel	0:18	0.3
1-Dec-21	Katie Haas	Rosario (Richard)	Prep	Review deposition digests	2:30	2.5
2-Dec-21	Katie Haas	Rosario (Richard)	Prep	Review deposition digests	2:30	2.5
2-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna, Emma, Nick, Kayla re next steps	0:09	0.2
2-Dec-21	Katie Haas	Rosario (Richard)	Draft	Draft and revise letter to court	0:24	0.4

5-Dec-21	Katie Haas	Rosario (Richard)	Prep	Trial outlining	5:00	5.0
6-Dec-21	Katie Haas	Rosario (Richard)	Court appearance	Pretrial conference	1:00	1.0
6-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Meetings with Emma, Kayla, Nick, Anna re trial prep and follow up tasks	2:00	2.0
6-Dec-21	Katie Haas	Rosario (Richard)	Draft	Draft motion for reconsideration re trial time	3:00	3.0
7-Dec-21	Katie Haas	Rosario (Richard)	Prep	Trial prep (meeting re exhibits with Anna, Emma, Nick, Kayla; meeting with Cam and Kayla; reviewing exhibits; call with opposing counsel; call with witness, etc.)	8:30	8.5
8-Dec-21	Katie Haas	Rosario (Richard)	Prep	Trial prep - emailing experts, reviewing exhibits with redactions, revising exhibit list, sharing exhibits with opposing counsel, draft subpoenas and cover letters, emails with investigator re service	6:30	6.5
9-Dec-21	Katie Haas	Rosario (Richard)	Prep	Revise objections to defendants' exhibits, revise our exhibit list, review exhibits and redactions, draft witness subpoena and cover letter, review prior witness testimony	6:30	6.5
9-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Mtg with Nick, Emma, Anna, Cam, Gerardo re trial prep, follow up mtg with Cam and Gerardo	2:30	2.5
10-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Email to Richard, email to investigator	0:12	0.2
10-Dec-21	Katie Haas	Rosario (Richard)	Prep	Review and revise exhibits and exhibit list, create excerpt exhibits, phone calls with Emma and Cam	6:00	6.0
11-Dec-21	Katie Haas	Rosario (Richard)	Review	Review prior witness testimony and redact for purpose of exhibits	1:30	1.5
11-Dec-21	Katie Haas	Rosario (Richard)	Digest	Digest defendant's deposition	3:30	3.5
11-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Internal emails re exhibits, emails with opposing counsel	0:48	0.8
12-Dec-21	Katie Haas	Rosario (Richard)	Prep	Revise exhibit list, internal emails and calls, emails and calls with opposing counsel	5:00	5.0
13-Dec-21	Katie Haas	Rosario (Richard)	Review	Review and finalize exhibits, exhibit list, cover letter for court submission	3:00	3.0
13-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Internal emails and emails with opposing counsel re incorrect exhibit	0:36	0.6
13-Dec-21	Katie Haas	Rosario (Richard)	Prep	Deposition designations	2:30	2.5
13-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Internal emails, phone calls, chats	0:45	0.8
14-Dec-21	Katie Haas	Rosario (Richard)	Draft	Draft witness subpoena and cover letter	0:30	0.5
14-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Nick	0:18	0.3

14-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call with expert witness and follow up email to team	0:12	0.2
14-Dec-21	Katie Haas	Rosario (Richard)	Loan	Call with Nick and US Claims	0:45	0.8
14-Dec-21	Katie Haas	Rosario (Richard)	Review	Review, revise, clean up, finalize motion for reconsideration of time limits	4:00	4.0
14-Dec-21	Katie Haas	Rosario (Richard)	Review	Review and pull tasks from Judge's individual trial rules during COVID	1:00	1.0
14-Dec-21	Katie Haas	Rosario (Richard)	Prep	Deposition designations	0:30	0.5
15-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Team meetings with Anna, Emma, Nick, Gerardo, Cam, Kayla	2:30	2.5
15-Dec-21	Katie Haas	Rosario (Richard)	Draft	Draft jury instruction	0:24	0.4
15-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Email to chambers re telephone or in person conference	0:06	0.1
15-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Emails to opposing counsel, email to expert witness	0:24	0.4
15-Dec-21	Katie Haas	Rosario (Richard)	Review	Review prior filings re depositions and email team	0:30	0.5
15-Dec-21	Katie Haas	Rosario (Richard)	Review	Review defendants' filing re striking unvaccinated jurors	0:15	0.3
15-Dec-21	Katie Haas	Rosario (Richard)	Administrative	Update FPTC to do list	0:18	0.3
15-Dec-21	Katie Haas	Rosario (Richard)	Prep	Prep for final pretrial conference	4:00	4.0
16-Dec-21	Katie Haas	Rosario (Richard)	Prep	Prep for final pretrial conference	2:00	2.0
16-Dec-21	Katie Haas	Rosario (Richard)	Court appearance	Final pretrial conference and follow-up team discussion	3:00	3.0
16-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Emails with opposing counsel	0:15	0.3
16-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call witness, send internal team email re call	0:12	0.2
17-Dec-21	Katie Haas	Rosario (Richard)	Draft	Draft subpoenas and cover letters	1:00	1.0
17-Dec-21	Katie Haas	Rosario (Richard)	Draft	Discuss and draft letter to court re dismissing Silverman	0:18	0.3
17-Dec-21	Katie Haas	Rosario (Richard)	Prep	Meetings with Emma, calling witnesses, create document tracking witness logistical arrangements	1:30	1.5
17-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Meeting with Kayla re assignments	0:30	0.5
19-Dec-21	Katie Haas	Rosario (Richard)	Digest	Defendant deposition digest	5:30	5.5
19-Dec-21	Katie Haas	Rosario (Richard)	Review	Review redactions to exhibits and send team email	0:24	0.4
19-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel	0:12	0.2
20-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Emails with investigator, opposing counsel, internal team	0:15	0.3
20-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Nick, Emma, Anna, Kayla, Gerardo	0:24	0.4
20-Dec-21	Katie Haas	Rosario (Richard)	Prep	Review and make objections to defendants' counter-designations	1:30	1.5
21-Dec-21	Katie Haas	Rosario (Richard)	Prep	Prep for continued FPTC	2:30	2.5
21-Dec-21	Katie Haas	Rosario (Richard)	Court appearance	Continued FPTC and follow-up internal team call	2:18	2.3

21-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel re meet and confer	0:06	0.1
21-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Review internal emails	0:15	0.3
21-Dec-21	Katie Haas	Rosario (Richard)	Administrative	Review notes on FPTC, update exhibit list	0:45	0.8
21-Dec-21	Katie Haas	Rosario (Richard)	Review	Review draft of opening	0:30	0.5
22-Dec-21	Katie Haas	Rosario (Richard)	Digest	Defendant deposition digest	4:30	4.5
22-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Call with Anna re tasks for today	0:09	0.2
22-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Call with Kayla re remote testimony, synching dep videos, drafting subpoenas, etc.	0:18	0.3
22-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Meet and confer with opposing counsel and follow-up internal discussion	1:15	1.3
22-Dec-21	Katie Haas	Rosario (Richard)	Draft	Draft and sign subpoena and cover letter, email to witness	0:18	0.3
23-Dec-21	Katie Haas	Rosario (Richard)	Other	Sign and finalize trial subpoenas	1:00	1.0
23-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Review and send electronic device requests	0:30	0.5
23-Dec-21	Katie Haas	Rosario (Richard)	Review	Review and edit letter to court	0:18	0.3
23-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Emails with opposing counsel re redactions	0:18	0.3
23-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Kayla	0:06	0.1
23-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Calls with Emma	0:15	0.3
27-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Cam	0:12	0.2
27-Dec-21	Katie Haas	Rosario (Richard)	Prep	Review alibi witness depositions, draft timeline	4:00	4.0
27-Dec-21	Katie Haas	Rosario (Richard)	Review	Review draft opening	0:30	0.5
28-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Trial prep tasks meeting	0:54	0.9
28-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Follow-up call with Kayla and Cam re trial prep tasks	0:24	0.4
28-Dec-21	Katie Haas	Rosario (Richard)	Draft	Draft letter to court re Alexis Gonzalez testimony, revise in response to feedback, finalize	1:30	1.5
28-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Emails to expert witnesses and fact witnesses	0:24	0.4
28-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Emails with opposing counsel and internal emails	0:30	0.5
28-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Strategy meeting with Emma, Nick, Anna, Gerardo	2:30	2.5
29-Dec-21	Katie Haas	Rosario (Richard)	Review	Read and discuss email from opposing counsel	0:15	0.3
29-Dec-21	Katie Haas	Rosario (Richard)	Meeting	Meeting with Julian, Mo, Gerardo, Kayla re courtroom exhibits	0:45	0.8
29-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Anna, Emma, Nick re letter to court	0:21	0.4
29-Dec-21	Katie Haas	Rosario (Richard)	Review	Review letters to court filed by opposing counsel	0:30	0.5
29-Dec-21	Katie Haas	Rosario (Richard)	Draft	Research and draft responses to opposing counsel's letters	2:30	2.5

29-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Email to and call with chambers re courtroom technology, internal follow-up call with Emma	0:18	0.3
29-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Internal emails re exhibits	0:06	0.1
29-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Calls with Kayla	0:24	0.4
29-Dec-21	Katie Haas	Rosario (Richard)	Digest	By-topic witness deposition digest	4:30	4.5
30-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Email to and phone call with fact witness	0:12	0.2
30-Dec-21	Katie Haas	Rosario (Richard)	Prep	Prep with Richard	2:00	2.0
30-Dec-21	Katie Haas	Rosario (Richard)	Other	Draft cover letters to fact witnesses re remote testimony	0:21	0.4
30-Dec-21	Katie Haas	Rosario (Richard)	Draft	Draft and finalize letter to court re efforts to reach witnesses	0:36	0.6
30-Dec-21	Katie Haas	Rosario (Richard)	Prep	Draft direct examination outline for fact witness	3:30	3.5
31-Dec-21	Katie Haas	Rosario (Richard)	Review	Review witness binders and suggest changes	0:45	0.8
31-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma, Anna, Nick, Cam, Gerardo re trial prep	1:30	1.5
31-Dec-21	Katie Haas	Rosario (Richard)	Review	Review revised opening	0:18	0.3
31-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call with Cam re exhibit list	0:15	0.3
31-Dec-21	Katie Haas	Rosario (Richard)	Phone Call	Call to Carlos Maldonado Jr. re trial adjourned	0:06	0.1
31-Dec-21	Katie Haas	Rosario (Richard)	Correspondence	Email to expert re trial adjourned	0:06	0.1
3-Jan-22	Katie Haas	Rosario (Richard)	Review	Review court's order, send internal email	0:15	0.3
4-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Team phone call re next steps	0:24	0.4
4-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Email to witness re adjourning trial	0:06	0.1
4-Jan-22	Katie Haas	Rosario (Richard)	Review	Review comments on direct examination outline	0:15	0.3
5-Jan-22	Katie Haas	Rosario (Richard)	Loan	Call with Nick, review Richard's litigation loans for terms	0:21	0.4
5-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with opposing counsel re trial dates	0:21	0.4
5-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma re feedback on direct examination outline	0:24	0.4
5-Jan-22	Katie Haas	Rosario (Richard)	Draft	Draft and revise letter to court re trial dates	0:24	0.4
5-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Emails to experts re trial availability	0:12	0.2
6-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Nick re file locations, follow up email	0:06	0.1
6-Jan-22	Katie Haas	Rosario (Richard)	Review	Review and revise letter to court re trial dates	0:30	0.5
7-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma re trial rescheduled	0:09	0.2
10-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma, Anna, Nick, Kayla, Cam, Gerardo re trial prep	0:42	0.7
10-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Email to court deputy	0:06	0.1
10-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Emails with expert re scheduling	0:06	0.1
10-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel re requesting court conference	0:06	0.1

10-Jan-22	Katie Haas	Rosario (Richard)	Review	Review jury charge, voir dire, and send internal email re changes	1:00	1.0
10-Jan-22	Katie Haas	Rosario (Richard)	Draft	Draft letter to court requesting conference	0:30	0.5
10-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma and Cam re trial binders	0:18	0.3
10-Jan-22	Katie Haas	Rosario (Richard)	Prep	Draft outline of direct examination and by-topic digest for witness	5:00	5.0
11-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma, Cam, Kayla, Gerardo re trial exhibits	0:12	0.2
11-Jan-22	Katie Haas	Rosario (Richard)	Filing	Finalize letter to court requesting conference	0:12	0.2
11-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Meeting with Emma, Nick, Kayla, Cam, Gerardo re opening demonstratives	0:18	0.3
11-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
11-Jan-22	Katie Haas	Rosario (Richard)	Prep	Draft outline of direct examination and by-topic digest for witness	4:00	4.0
12-Jan-22	Katie Haas	Rosario (Richard)	Prep	Prep for testimony with Richard, Nick, Gerardo	1:15	1.3
12-Jan-22	Katie Haas	Rosario (Richard)	Prep	Prep for pretrial conference	3:30	3.5
12-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with opposing counsel and court deputy re electronic submissions and courtroom assignment	0:12	0.2
12-Jan-22	Katie Haas	Rosario (Richard)	Court appearance	discussion	1:30	1.5
12-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Emails to witnesses re trial date	0:09	0.2
13-Jan-22	Katie Haas	Rosario (Richard)	Review	Review and revise letter to court	0:12	0.2
13-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Email to court deputy re remote testimony	0:06	0.1
13-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma re trial tasks	0:33	0.6
13-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with witness re scheduling	0:06	0.1
13-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Internal emails re trial tasks	0:09	0.2
13-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Cam re trial tasks	0:12	0.2
13-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Emails with vendor re remote testimony location	0:30	0.5
13-Jan-22	Katie Haas	Rosario (Richard)	Draft	Draft trial subpoenas and cover letters	0:30	0.5
13-Jan-22	Katie Haas	Rosario (Richard)	Draft	Draft and revise limiting instructions, send to defendants	1:00	1.0
14-Jan-22	Katie Haas	Rosario (Richard)	Court appearance	Telephonic conference with court	0:30	0.5
14-Jan-22	Katie Haas	Rosario (Richard)	Phone Call	Internal phone call re adjournment of trial	0:21	0.4
14-Jan-22	Katie Haas	Rosario (Richard)	Correspondence	Emails and phone calls to witnesses/vendors re adjournment of trial	0:24	0.4
18-Jan-22	Katie Haas	Rosario (Richard)	Review	Review investigator invoice	0:06	0.1
8-Mar-22	Katie Haas	Rosario (Richard)	Correspondence	Internal emails re trial date	0:15	0.3

18-Mar-22	Katie Haas	Rosario (Richard)	Correspondence	Emails to experts re trial date	0:12	0.2
14-Apr-22	Katie Haas	Rosario (Richard)	Correspondence	Internal team email re pretrial deadlines	0:06	0.1
18-Apr-22	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
19-Apr-22	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
27-Apr-22	Katie Haas	Rosario (Richard)	Phone Call	Call with opposing counsel and Emma	0:18	0.3
29-Apr-22	Katie Haas	Rosario (Richard)	Draft	Discuss joint letter with Anna and Emma, draft and revise our portion of joint letter, emails with opposing counsel	1:30	1.5
4-May-22	Katie Haas	Rosario (Richard)	Correspondence	Internal emails	0:06	0.1
5-May-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Cam and Emma re trial prep	0:12	0.2
5-May-22	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel	0:12	0.2
6-May-22	Katie Haas	Rosario (Richard)	Meeting	Meeting with Emma and Cam	0:30	0.5
9-May-22	Katie Haas	Rosario (Richard)	Review	Review draft demonstrative	0:15	0.3
10-May-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Cam, call with full NSB team	0:42	0.7
11-May-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Cam re deadlines	0:12	0.2
11-May-22	Katie Haas	Rosario (Richard)	Meeting	Meeting with Nick and Emma, follow up emails and review of court's orders	1:00	1.0
11-May-22	Katie Haas	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
12-May-22	Katie Haas	Rosario (Richard)	Correspondence	Review court's order, internal email	0:15	0.3
13-May-22	Katie Haas	Rosario (Richard)	Phone Call	Calls with Emma	0:09	0.2
13-May-22	Katie Haas	Rosario (Richard)	Draft	Draft joint letter, revise, finalize, and supervise filing	2:30	2.5
16-May-22	Katie Haas	Rosario (Richard)	Correspondence	Review email from opposing counsel, internal emails, email to opposing counsel	0:36	0.6
18-May-22	Katie Haas	Rosario (Richard)	Review	Review and respond to draft extension request from opposing counsel	0:30	0.5
25-May-22	Katie Haas	Rosario (Richard)	Correspondence	Calls and emails to witnesses	0:30	0.5
25-May-22	Katie Haas	Rosario (Richard)	Court appearance	Telephonic court conference	0:42	0.7
31-May-22	Katie Haas	Rosario (Richard)	Correspondence	Gather documents, internal emails, draft joint letter, send email to opposing counsel	1:30	1.5
3-Jun-22	Katie Haas	Rosario (Richard)	Phone Call	Calls with Emma re joint letter	0:30	0.5
3-Jun-22	Katie Haas	Rosario (Richard)	Phone Call	Call with opposing counsel	0:12	0.2
3-Jun-22	Katie Haas	Rosario (Richard)	Filing	Draft, revise, and file joint letter, plus related internal emails and emails to opposing counsel	1:30	1.5
6-Jun-22	Katie Haas	Rosario (Richard)	Review	Review defendants letter and related docs, develop argument in response	3:00	3.0

7-Jun-22	Katie Haas	Rosario (Richard)	Draft	Draft, revise, finalize response to defendants letter	2:30	2.5
14-Jun-22	Katie Haas	Rosario (Richard)	Meeting	Opening statement feedback session	2:15	2.3
16-Jun-22	Katie Haas	Rosario (Richard)	Meeting	Onboarding meeting	0:30	0.5
16-Jun-22	Katie Haas	Rosario (Richard)	Meeting	Meet and confer with opposing counsel	0:09	0.2
23-Jun-22	Katie Haas	Rosario (Richard)	Draft	Draft, revise, finalize response to alibi witness letter	1:00	1.0
24-Jun-22	Katie Haas	Rosario (Richard)	Draft	Draft, revise, finalize response to alibi witness letter	0:30	0.5
24-Jun-22	Katie Haas	Rosario (Richard)	Loan	Review loan documents	0:30	0.5
				Draft letter to court, internal emails and calls re letter, revise letter, finalize letter for filing		
28-Jun-22	Katie Haas	Rosario (Richard)	Draft	Draft letter to court, internal emails and calls re letter, revise letter, finalize letter for filing	1:00	1.0
5-Jul-22	Katie Haas	Rosario (Richard)	Meeting	Meeting re subpoenas and tech	0:18	0.3
6-Jul-22	Katie Haas	Rosario (Richard)	Meeting	trial team meeting	0:45	0.8
6-Jul-22	Katie Haas	Rosario (Richard)	Correspondence	Email to witness and opposing counsel	0:18	0.3
11-Jul-22	Katie Haas	Rosario (Richard)	Prep	Internal calls, emails, document review for trial prep	1:00	1.0
11-Jul-22	Katie Haas	Rosario (Richard)	Phone Call	email	0:15	0.3
				Review filings, have phone call, draft letter, finalize and file letter		
15-Jul-22	Katie Haas	Rosario (Richard)	Draft	Review filings, have phone call, draft letter, finalize and file letter	1:00	1.0
16-Jul-22	Katie Haas	Rosario (Richard)	Review	Review newly received discovery materials and draft letter	4:00	4.0
16-Jul-22	Katie Haas	Rosario (Richard)	Correspondence	Phone call with witness and internal follow up email	0:12	0.2
17-Jul-22	Katie Haas	Rosario (Richard)	Draft	Draft letter to court	0:30	0.5
17-Jul-22	Katie Haas	Rosario (Richard)	Loan	Review terms of litigation loans, send related emails	1:00	1.0
17-Jul-22	Katie Haas	Rosario (Richard)	Phone Call	Calls with Cam re trial prep	1:00	1.0
18-Jul-22	Katie Haas	Rosario (Richard)	Phone Call	Call with opposing counsel, follow up internal email	0:18	0.3
18-Jul-22	Katie Haas	Rosario (Richard)	Loan	Email to litigation loan company	0:12	0.2
18-Jul-22	Katie Haas	Rosario (Richard)	Correspondence	Emails with court reporters and Cam re pretrial transcripts	0:12	0.2
18-Jul-22	Katie Haas	Rosario (Richard)	Review	Finalize letter to court to file	0:09	0.2
18-Jul-22	Katie Haas	Rosario (Richard)	Meeting	Trial team meeting	1:00	1.0
18-Jul-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Emma	0:18	0.3
18-Jul-22	Katie Haas	Rosario (Richard)	Phone Call	Call with Cam	0:12	0.2
				Review all of court's rulings re trial practice and procedure, admissible evidence, etc., and gather info into one document		
18-Jul-22	Katie Haas	Rosario (Richard)	Review	Review all of court's rulings re trial practice and procedure, admissible evidence, etc., and gather info into one document	4:00	4.0
18-Jul-22	Katie Haas	Rosario (Richard)	Phone Call	Call w Gerardo	0:12	0.2
19-Jul-22	Katie Haas	Rosario (Richard)	Administrative	Create list of topics to raise at PTC	0:12	0.2
19-Jul-22	Katie Haas	Rosario (Richard)	Correspondence	Emails to opposing counsel and expert witness	0:18	0.3
19-Jul-22	Katie Haas	Rosario (Richard)	Court appearance	Pretrial conference	1:00	1.0

19-Jul-22	Katie Haas	Rosario (Richard)	Prep	Prep for pretrial conference and trial	5:30	5.5
19-Jul-22	Katie Haas	Rosario (Richard)	Filing	Prepare witness and exhibit lists to send to court	2:00	2.0
20-Jul-22	Katie Haas	Rosario (Richard)	Correspondence	Emails to various parties (opposing counsel, witness, litigation loan company)	0:30	0.5
20-Jul-22	Katie Haas	Rosario (Richard)	Draft	Review documents, research, and draft letter to court	3:00	3.0
20-Jul-22	Katie Haas	Rosario (Richard)	Review	list	1:30	1.5
20-Jul-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	5:00	5.0
20-Jul-22	Katie Haas	Rosario (Richard)	Filing	Meeting, emails, drafting etc related to submission on for cause challenges to jurors	1:00	1.0
21-Jul-22	Katie Haas	Rosario (Richard)	Loan	Review updated terms of litigation loan	0:24	0.4
21-Jul-22	Katie Haas	Rosario (Richard)	Phone Call	Email and call to witness, follow up internal email	0:09	0.2
21-Jul-22	Katie Haas	Rosario (Richard)	Miscellaneous	Finalizing deposition designation order, including related emails and calls	2:00	2.0
21-Jul-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	3:00	3.0
22-Jul-22	Katie Haas	Rosario (Richard)	Loan	Review and finalize litigation loan documents for client signature	0:30	0.5
22-Jul-22	Katie Haas	Rosario (Richard)	Phone Call	Call with witness and follow up internal email	0:12	0.2
22-Jul-22	Katie Haas	Rosario (Richard)	Draft	Draft letter to court re limiting instruction and send to defendants, review defendants' portion and draft response	1:30	1.5
22-Jul-22	Katie Haas	Rosario (Richard)	Draft	Draft letter to court re designation time allocations and send to defendants	0:24	0.4
22-Jul-22	Katie Haas	Rosario (Richard)	Filing	Create and finalize filing re court-ordered jury instructions	0:30	0.5
22-Jul-22	Katie Haas	Rosario (Richard)	Miscellaneous	Courtroom tech walkthrough	0:30	0.5
22-Jul-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	6:00	6.0
23-Jul-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	4:00	4.0
23-Jul-22	Katie Haas	Rosario (Richard)	Draft	Draft letter response re text messages	1:18	1.3
24-Jul-22	Katie Haas	Rosario (Richard)	Prep	Prep for trial	8:00	8.0
25-Jul-22	Katie Haas	Rosario (Richard)	Prep	Gather materials at office and transport to courthouse	0:30	0.5
25-Jul-22	Katie Haas	Rosario (Richard)	Court appearance	Trial	7:00	7.0
25-Jul-22	Katie Haas	Rosario (Richard)	Prep	Prep for trial	7:00	7.0
26-Jul-22	Katie Haas	Rosario (Richard)	Prep	Gather materials at office and transport to courthouse	0:18	0.3
26-Jul-22	Katie Haas	Rosario (Richard)	Court appearance	Trial	7:00	7.0
27-Jul-22	Katie Haas	Rosario (Richard)	Prep	Prep for trial	8:00	8.0
28-Jul-22	Katie Haas	Rosario (Richard)	Prep	Prep for trial	8:30	8.5

29-Jul-22	Katie Haas	Rosario (Richard)	Prep	Prep for trial	10:30	10.5
30-Jul-22	Katie Haas	Rosario (Richard)	Prep	Prep for trial	4:30	4.5
31-Jul-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	12:15	12.3
1-Aug-22	Katie Haas	Rosario (Richard)	Prep	Gather materials at office and transport to courthouse	0:30	0.5
1-Aug-22	Katie Haas	Rosario (Richard)	Court appearance	Trial	7:00	7.0
1-Aug-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	7:30	7.5
2-Aug-22	Katie Haas	Rosario (Richard)	Prep	Gather materials at office and transport to courthouse	0:18	0.3
2-Aug-22	Katie Haas	Rosario (Richard)	Court appearance	Trial	7:00	7.0
2-Aug-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	8:00	8.0
3-Aug-22	Katie Haas	Rosario (Richard)	Prep	Gather materials at office and transport to courthouse	0:24	0.4
3-Aug-22	Katie Haas	Rosario (Richard)	Court appearance	Trial	7:00	7.0
3-Aug-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	8:00	8.0
4-Aug-22	Katie Haas	Rosario (Richard)	Prep	Gather materials at office and transport to courthouse	0:36	0.6
4-Aug-22	Katie Haas	Rosario (Richard)	Court appearance	Trial	7:00	7.0
4-Aug-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	2:00	2.0
5-Aug-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	8:00	8.0
6-Aug-22	Katie Haas	Rosario (Richard)	Prep	Trial prep	9:30	9.5
7-Aug-22	Katie Haas	Rosario (Richard)	Prep	Trial Prep	13:30	13.5
8-Aug-22	Katie Haas	Rosario (Richard)	Court appearance	Trial	7:00	7.0
8-Aug-22	Katie Haas	Rosario (Richard)	Prep	Gather materials at office and transport to court	0:18	0.3
8-Aug-22	Katie Haas	Rosario (Richard)	Prep	Trial Prep	8:00	8.0
9-Aug-22	Katie Haas	Rosario (Richard)	Prep	Gather materials at office and transport to court	0:12	0.2
9-Aug-22	Katie Haas	Rosario (Richard)	Court appearance	Trial	7:00	7.0
9-Aug-22	Katie Haas	Rosario (Richard)	Prep	Trial Prep	8:00	8.0
10-Aug-22	Katie Haas	Rosario (Richard)	Prep	Gather materials at office and transport to court	0:30	0.5
10-Aug-22	Katie Haas	Rosario (Richard)	Court appearance	Trial	2:30	2.5
11-Aug-22	Katie Haas	Rosario (Richard)	Research	Research deadlines for post-trial motions and fee petition	0:30	0.5

**Total** 663.4